

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

K.MIZRA LLC,

Plaintiff,

v.

CISCO SYSTEMS, INC.,

Defendant.

Civil Action No. 6:20-cv-01031-ADA

Jury Trial Demanded

JOINT NOTICE OF PROPOSED AMENDMENT OF SCHEDULING ORDER

Plaintiff K.Mizra LLC and Defendant Cisco Systems, Inc. (collectively, "the Parties") respectfully submit this notice of their proposed amendment of certain dates set forth in the Court's scheduling order at ECF No. 76. Specifically, the Parties have agreed upon a two-week extension of time to complete fact discovery and expert discovery to ensure the Parties have sufficient time to serve written discovery requests, respond to written discovery requests, and schedule and take fact and expert witness depositions. The Parties also have agreed upon a one-week extension of time for the filing of any dispositive motions and *Daubert* motions, following the close of expert discovery.

The Parties note that the current dates for pretrial disclosures, motions *in limine*, pretrial submissions, the final pretrial conference, and trial, *see* ECF No. 76, will not be affected by the Parties' proposed amended schedule. For the Court's convenience, a comparison of the current dates and the Parties' proposed dates are set forth in the following chart:

Event	Current Date (per ECF No. 76)	Parties' Proposed Date
Close of Fact Discovery.	March 17, 2023	March 31, 2023
Opening Expert Reports.	March 31, 2023	April 14, 2023
Rebuttal Expert Reports.	April 21, 2023	May 5, 2023
Close of Expert Discovery.	May 12, 2023	May 26, 2023
Deadline to meet and confer to discuss narrowing the number of claims asserted and prior art references to triable limits.	May 19, 2023	May 26, 2023
Dispositive motion deadline and <i>Daubert</i> motion deadline.	May 26, 2023	June 2, 2023
Serve Pretrial Disclosures (jury instructions, exhibit lists, witness lists, discovery, and deposition designations).	June 9, 2023	No proposed change to current date.
Serve objections to pretrial disclosures/rebuttal disclosures.	June 23, 2023	No proposed change to current date.
Serve objections to rebuttal disclosures and file motions <i>in limine</i> .	June 30, 2023	No proposed change to current date.
File Joint Pretrial Order and Pretrial Submissions (jury instructions, exhibit lists, witness lists, discovery and deposition designations).	July 14, 2023	No proposed change to current date.
File oppositions to motions <i>in limine</i> .	July 14, 2023	No proposed change to current date.
File Notice of Request for Daily Transcript or Real Time Reporting, per ECF No. 76.	July 21, 2023	No proposed change to current date.
Deadline to meet and confer regarding remaining objections and disputes on motions <i>in limine</i> .	July 21, 2023	No proposed change to current date.
File joint notice identifying remaining objections to pretrial disclosures and disputes on motions <i>in limine</i> .	July 28, 2023	No proposed change to current date.
Final Pretrial Conference.	August 1, 2023	No proposed change to current date.
Jury Selection/Trial.	August 14, 2023	No proposed change to current date.

Accordingly, the Parties respectfully request that the Court enter the Amended Scheduling Order as set forth in the above chart.

Dated: February 9, 2023

Respectfully submitted,

By: /s/ Angela J. Bubis

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been served on February 9, 2023, to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system.

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